

Evan A. Jenness (Calif. Bar No. 136822)
Law Offices of Evan Jenness
2115 Main Street
Santa Monica, California 90405
310-399-3259

William J. Genego (Calif. Bar No. 103224)
wgenego@gmail.com
Nasatir, Hirsch, Podberesky Khoro & Genego
2115 Main Street
Santa Monica, California 90405
Telephone: 310-399-3259

Counsel for Defendant
Peter Townsley

United States District Court
Northern District of California

UNITED STATES OF AMERICA

Plaintiff,

vs.

PETER TOWNSLEY,

Defendant.

No. CR 10-0428 CRB

STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE BOND
HEARING FROM DECEMBER 17,
2010 TO JANUARY 7, 2011

Peter Townsley, through his counsel of record, and the United States, through its counsel of record, stipulate to the following:

1. The status hearing in this matter regarding the posting of the bond was continued once previously from November 19, 2010 to December 17, 2010, to allow additional for completion of the appraisal of the commercial property (in Gonzalez, California) that is to secure \$300,000 of the bond.

2. Counsel for Mr. Townsley has advised counsel for the Government that the appraisal company has reported that the appraisal will not be completed until December 21, 2010.

3. Counsel for Mr. Townsley has provided the government with (a) a copy of the contract for the appraisal; (b) proof that a lien against the property in

1 Gonzalez, California in the amount of \$300,000 in favor of the Clerk of the Court,
2 Northern District of California was recorded on November 10, 2010; (c) a current
3 title report; and (d) documentation of the tax assessed value of the property,
4 which reflects more than sufficient equity to satisfy the bond.

5 4. Prior to approving the bond, the government has requested a current
6 appraisal of the property.

7 5. In light of the posting of the property, and the ongoing good faith efforts
8 to provide the government with the additional information it has requested
9 before approving the bond, the parties jointly request that the Court continue the
10 hearing on the status regarding the posting of the property that is currently
11 scheduled for December 17, 2010, at 10:30 a.m. to January 7, 2011, at 10:30 a.m.
12

13 As counsel for Peter Townsley, I stipulate to paragraphs 1-5, *supra*.

14 Dated: December 7, 2010 Signed: /s/ William J. Genego
15

16 As counsel for the United States, I stipulate to paragraphs 1-5, *supra*.

17 Melinda Haag, United States Attorney

18 Dated: December 8, 2010 By: /s/ Susan Badger
19 Assistant U.S. Attorney

20 The Court approves the stipulation and hereby ORDERS that:
21

22 The hearing on the status regarding the posting of the property that is
23 currently scheduled for December 17, 2010, at 10:30 a.m., is continued to January
24 7, 2011, at 10:30 a.m.

25 IT IS SO ORDERED.

26 Dated: 12/10/10
27
28

